

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

In Re: C M HEAVY MACHINERY, LLC Debtor.)))))	Case No. 24-80617 Chapter 7
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APPLICATION TO EMPLOY ATTORNEY FOR TRUSTEE

Kelley G. Loud, Trustee, applies to this Court for authority to employ Kelley G. Loud and the law firm of Titus Hillis Reynolds Love (“Titus Hillis”) as counsel pursuant to 11 U.S.C. Section 327 and Bankruptcy Rule 2014. In support, the Trustee would show the Court as follows:

1. The Debtors filed a Voluntary Petition for Relief under Chapter 11 of the United States Bankruptcy Code on August 8, 2024.
2. The Chapter 11 matter was subsequently converted under Chapter 7 of the United States Bankruptcy Code on June 27, 2025.
3. Kelley G. Loud is the duly appointed, acting and qualified Chapter 7 Trustee of this Estate.
4. There are certain matters involved in the administration of this Estate which require the services of an attorney.
5. The Trustee should be authorized to retain counsel to represent the Estate in all matters pertaining to the administration of this Estate. Kelley G. Loud, Trustee, and the other attorneys at Titus Hillis are well qualified in bankruptcy matters.
6. No member of Titus Hillis holds or represents an interest adverse to the Estate with respect to the matter on which they are to be employed and are disinterested persons.
7. No member of the law firm of Titus Hillis has served as an Examiner in this case.

8. The law firm of Titus Hillis has been paid no sums for the representation of the Trustee in this case. The hourly rates charged by the law firm of Titus Hillis range from \$150.00 or paralegals, between \$185.00 and \$205.00 for associates, and between \$325.00 and \$375.00 for partners.

9. An Affidavit of Kelley G. Loud, pursuant to Bankruptcy Rule 2014(a), is attached hereto as Exhibit 1.

WHEREFORE, Kelley G. Loud, Trustee, requests this Court to enter an Order authorizing her to retain Titus Hillis as set forth above.

Respectfully submitted:

s/Kelley G. Loud
Kelley G. Loud, OBA #15808
kloud@titushillis.com
TITUS HILLIS REYNOLDS LOVE
15 East Fifth Street, Suite 3700
Tulsa, Oklahoma 74103
(918) 587-6800 FAX: (918) 587-6822
Chapter 7 Trustee

IN THE UNITED STATES BANKRUPTCY COURT
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In Re:

C M HEAVY MACHINERY, LLC

Debtor.

)
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AFFIDAVIT OF ATTORNEY

1. I have been appointed to serve on the panel of Chapter 7 Trustees for the Northern and Eastern Districts of Oklahoma.


2. I and the members of the firm of Titus Hillis Reynolds Love ("Titus Hillis") are duly licensed and practicing attorneys in the State of Oklahoma.

3. I and the members of Titus Hillis are disinterested persons as that term is defined by 11 U.S.C. Section 101(13), do not represent any interest adverse to this Estate, have not served as examiners in connection with this bankruptcy case, and do not represent a creditor in connection with this bankruptcy case.

4. Kelley G. Loud and Titus Hillis do not represent any creditor, or any other party in interest, in connection with this case and have no connection with the United States Interim Trustee, or any person employed in the Office of the United States Interim Trustee.

5. I do hereby certify that the foregoing instrument is true and correct to the best of my knowledge, information and belief.


Dated July 3, 2025.


Kelley G. Loud

Sworn and subscribed to before me this 3rd day of July, 2025.

(SEAL)




Notary Public